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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 vs.

GOOGLE LLC,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF ANNE-RAPHAELLE  
AUBRY IN SUPPORT OF GOOGLE  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL PORTIONS OF ITS MOTION FOR  
SUMMARY JUDGMENT SLIDES**

1 I, Anne-Raphaelle Aubry, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of Massachusetts and am admitted to  
3 practice *pro hac vice* before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP  
4 representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under  
7 Seal Portions of Its Notice of Lodging Presentation Slides Re The March 30, 2023 Summary  
8 Judgment Hearing (“Notice”). If called as a witness, I could and would testify competently to the  
9 information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to be Filed Under Seal	Designating Party
Attachment A to Google’s Notice (“Attachment A”)	Portions outlined in yellow boxes	Google
Attachment A	Portions outlined in green boxes	Google and Sonos

15 4. The portions of Attachment A outlined in yellow boxes contain references to Google’s  
16 confidential business information and trade secrets, including details regarding source code,  
17 architecture, and technical operation of Google’s products and functionalities that Sonos accuses of  
18 infringement. The specifics of how these functionalities operate is confidential information that  
19 Google does not share publicly. Thus, public disclosure of such information could lead to competitive  
20 harm to Google as competitors could use these details regarding the architecture and functionality of  
21 Google’s products to gain a competitive advantage in the marketplace with respect to their competing  
22 products. Google has therefore designated this information as HIGHLY CONFIDENTIAL—  
23 ATTORNEYS’ EYES ONLY and/ or HIGHLY CONFIDENTIAL/ATTORNEYS’ EYES ONLY—  
24 SOURCE CODE under the protective order (Dkts. 92, 94), I also understand that a less restrictive  
25 alternative than sealing portions of the Notice would not be sufficient because the information sought  
26 to be sealed is Google’s confidential business information and trade secrets but is necessary to  
27 Google’s Motion for Summary Judgment.  
28



**ATTESTATION**

I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Anne-Raphaelle Aubry has concurred in the aforementioned filing.

DATED: April 28, 2023

/s/ Sean Pak

Sean Pak